

**JEREMY DELMORAL,
DARIUS WRIGHT,
YOUSIF ALHUJAZI, a/k/a "Jacob,"
JOSHUA MALDONADO,
CHAD RIVERS,
MICHAEL HAYES,
JOSE LABOY, and
[REDACTED]**

conspired with each other and others to knowingly and intentionally possess with intent to distribute and to distribute a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

As to defendants **EDMALDO FIGUERO-MARTINEZ, a/k/a "Po," EDDIE MARTINEZ-FIGUEROA, NATASHA COLON-FLORES, ERIC MARTINEZ, a/k/a "Boobie," and JAMEL FEBUS, a/k/a "Shrimp,"** that violation involved one (1) kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(A).

As to defendants **DENNIS FIGUEROA, a/k/a "Lucky," DAVID NICHOLS, JEREMY DELMORAL, DARIUS WRIGHT, YOUSIF ALHUJAZI, a/k/a "Jacob," JOSHUA MALDONADO, CHAD RIVERS, MICHAEL HAYES, JOSE LABOY, and [REDACTED],** that violation involved one hundred (100) grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(B).

COUNT 2

[Possession of a Firearm in Furtherance of a Drug Trafficking Crime]

On or about August 4, 2015, in Oneida County in the Northern District of New York, the defendant,

DENNIS FIGUEROA, a/k/a "Lucky,"

in furtherance of drug trafficking crimes for which he may be prosecuted in a court of the United States, that is violations of Title 21, United States Code, Sections 841(a)(1) and 846, knowingly possessed the following firearm: an Imperial Metal Product, Inc. .22 caliber handgun, with serial number 97792.

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 3
[Maintaining Drug-Involved Premises]

From in or about June 2015, through in or about July 2015, in Oneida County in the Northern District of New York, the defendant, **ALEXANDER SISTI**, while managing and controlling a place at 800 West Liberty Street, Rome, New York, as an owner, lessee, agent, employee, and mortgagee, did knowingly and intentionally rent, lease, profit from and make available for use, with and without compensation, the place for the purpose of unlawfully manufacturing, storing, distributing, and using a controlled substance, that is heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 856(a)(2).

COUNT 4
[Maintaining Drug-Involved Premises]

From in or about June 2015, through in or about July 2015, in Oneida County in the Northern District of New York, the defendant, **JEFFREY LEACHMAN**, while managing and controlling a place at 109 First Street, Apartment #2, Rome, New York, as an owner, lessee, agent, employee, and mortgagee, did knowingly and intentionally rent, lease, profit from and make available for use, with and without compensation, the place for the purpose of unlawfully manufacturing, storing, distributing, and using a controlled substance, that is heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 856(a)(2).

COUNT 5
[Maintaining Drug-Involved Premises]

From in or about June 2015, through in or about July 2015, in Oneida County in the Northern District of New York, the defendant, **KAREN PEPPER**, while managing and controlling a place at 2611 Genesee Street, Apartment #1N, Utica, New York, as an owner, lessee, agent, employee, and mortgagee, did knowingly and intentionally rent, lease, profit from and make available for use, with and without compensation, the place for the purpose of unlawfully manufacturing, storing, distributing, and using a controlled substance, that is heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 856(a)(2).

ALLEGATION REGARDING PREVIOUS FELONY DRUG CONVICTION

1. Count I of this Indictment is realleged and incorporated by reference.
2. Defendant **EDMALDO FIGUERO-MARTINEZ**, is subject to increased punishment, pursuant to Title 21, United States Code, Sections 841(b)(1)(A), because of the following prior conviction for a felony drug offense which has become final:

EDMALDO FIGUERO-MARTINEZ was convicted on or about March 1, 2010, in Oneida County Court of Criminal Possession of a Controlled Substance in the Third Degree (New York Penal law Section 220.16(1)), a Class B felony, and was sentenced to one (1) year incarceration.

3. Defendant **EDDIE MARTINEZ-FIGUEROA**, is subject to increased punishment, pursuant to Title 21, United States Code, Sections 841(b)(1)(A), because of the following prior conviction for a felony drug offense which has become final:

EDDIE MARTINEZ-FIGUEROA was convicted on or about October 7, 2010, in Oneida County Court of Criminal Possession of a Controlled Substance in the Third Degree

(New York Penal law Section 220.16(1)), a Class B felony, and was sentenced to four (4) years' incarceration.

4. By virtue of said prior convictions, the defendants **EDMALDO FIGUERO-MARTINEZ** and **EDDIE MARTINEZ-FIGUEROA** are subject to the enhanced penalty provisions in Title 21, United States Code, Section 851.

FIRST FORFEITURE ALLEGATION

The allegations contained in Counts 1 and 3-5 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

Pursuant to Title 21, United States Code, Section 853, upon conviction of offenses in violation of Title 21, United States Code, Section 846, the defendants, **EDMALDO FIGUERO-MARTINEZ**, a/k/a "Po," **EDDIE MARTINEZ-FIGUEROA**, **NATASHA COLON-FLORES**, **ERIC MARTINEZ**, **JAMEL FEBUS**, a/k/a "Shrimp," **DENNIS FIGUEROA**, a/k/a "Lucky," **DAVID NICHOLS**, **JEREMY DELMORAL**, **DARIUS WRIGHT**, **YOUSIF ALHUJAZI**, a/k/a "Jacob," **JOSHUA MALDONADO**, **CHAD RIVERS**, **MICHAEL HAYES**, **JOSE LABOY**, **ALEXANDER SISTI**, **JEFFREY LEACHMAN**, **KAREN PEPPER**, and [REDACTED] shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses. The property to be forfeited includes, but is not limited to, the following:

- (1) A money judgment in the amount of \$1,000,000.00, for which the defendants are jointly and severally liable.

SECOND FORFEITURE ALLEGATION

The allegations contained in Count 2 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) by Title 28, United States Code, Section 2461(c), and Title 21, United States Code, Section 853.

Pursuant to Title 18, United States Code, Section 924(d)(1) by Title 28, United States Code, Section 2461(c), and Title 21, United States Code, Section 853, and upon conviction of an offense in violation of Title 18, United States Code, Section 924(a)(2), and Title 21, United States Code, Sections 841 and 846, defendant shall forfeit to the United States of America any firearms and ammunition involved in the commission of the offenses, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses, including, but not limited to:

A. Firearms

One Imperial Metal Product, Inc. .22 caliber handgun, with serial number 97792.

Substitute Property

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

Dated: November 12, 2015


A TRUE BILL,

**NAME REDACTED

Grand Jury Foreperson

RICHARD S. HARTUNIAN
United States Attorney

By:


Carla Freedman
Assistant United States Attorney
Bar Roll No. 514723